## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MECHANICAL DYNAMICS &	)		
ANALYSIS LLC, a Delaware	)		
Limited Liability Company,	)		
	)		
Plaintiff,	)		
	)	Case No.	1:18-cv-05639
V.	)		
	)	Honorable Joan B. Gottschall	
RICHARD J. RUZZO, an individual	)		
Illinois Resident	)		
	)		
Defendant.	)		

## MD&A'S MOTION FOR ENTRY OF AGREED CONSENT JUDGMENT

Plaintiff, Mechanical Dynamics & Analysis LLC ("MD&A"), pursuant to Federal Rule of Civil Procedure 7(b)(1) and through its undersigned attorney, requests that the Court enter the proposed Agreed Consent Judgment executed by both parties and attached hereto as Exhibit A. In support of this Motion, MD&A states that Defendant, Richard J. Ruzzo, consents to the entry of the Agreed Consent Judgment. Defendant signed a copy of the Agreed Consent Judgment on October 15, 2018, and a copy of the Agreed Consent Judgment signed by MD&A's counsel was mailed to Defendant on October 16, 2018. Contemporaneously with this Motion, the undersigned submitted Word and PDF versions of the Agreed Consent Judgment to the Court at: Proposed Order Gottschall@ilnd.uscourts.gov.

WHEREFORE, for the foregoing reasons, Defendant having consented to entry of the Agreed Consent Judgment, MD&A respectfully requests that this Court enter the proposed Agreed Consent Judgment.

Dated: October 16, 2018 Respectfully submitted,

By: /s/ William H. Frankel

William H. Frankel (IL ARDC No.3127933) E. Brandon Nykiel (IL ARDC No. 6297310) **BRINKS GILSON & LIONE, P.C.** NBC Tower, Suite 3600 455 N. Cityfront Plaza Drive

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Counsel for Plaintiff

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## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing **MD&A's Motion for Entry of Agreed Consent Judgment** was electronically filed on October 16, 2018, with the Clerk of the Court using the CM/ECF system and sent via Federal Express to:

Richard J. Ruzzo 2107 Sudbury Street Naperville, IL 60564

/s/ William H. Frankel

WILLIAM H. FRANKEL

Counsel for MD&A